Rebuttal Claim Chart
in Support of Leighton's Opposition to
Oberthur's Summary Judgment Motion for Invalidity

The following table illustrates the patent claim elements that are missing from the Oakwood brochures. Only the Oakwood prior art is discussed because, as set forth above in Leighton's Memorandum, Oberthur fails to provide any testimony whatsoever from one of ordinary skill to support the presence of the elements and limitations, or their use in combination, in the other prior art listed by Oberthur. Although the Oakwood brochures fail to teach many of the required patent claim elements found in the patents-in-suit, this chart only identifies the missing elements. Leighton therefore does not admit that all of the other elements that are not specified as missing elements in this table are disclosed or taught by the Oakwood brochures.

U.S. Pat. No. 5,817,207

Reference Key:
- 1987 Oakwood Series 6 Brochure ("OS6B")
- 1987 Oakwood Sales Brochure ("OSB")
- 1991 Oakwood Series 6 Instruction Manual ("OIM")

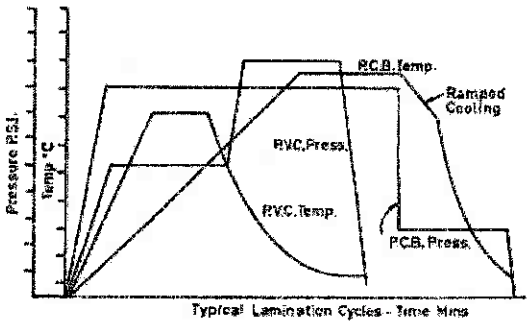
Claims (missing claim elements are highlighted in green or red)	**Prior Art**	**Application of Prior Art** (missing claim elements are highlighted in green or red)
1. A process for incorporating at least one electronic element in the manufacture of a plastic card, comprising the steps of:	1987 Oakwood Series 6 Brochure	"electronic element" – inductive codings or microchip (Sharinn Ex. 10, OS6B at 4, see illustration and text under heading "Machine Reading Applications"). *This reference does not disclose an electronic element* **Q.** Do these inductive coils that are shown here in the illustration that was attached to your declaration as paragraph 9 use a semiconductor device?

		MR. GASPARO: The objection stands. **A.** Not to my knowledge. **Q.** And they don't have any terminals, do they? **MR GASPARO:** Objection. **A.** My opinion -- your definition of a terminal? **Q.** An end point. **MR GASPARO:** Objection. **A.** That's not my definition of a terminal, but do they have an end point? Some of them, I believe, do. **Q.** Can you connect these? Can you connect the inductive coils to other components to form a circuit, in your view? **MR GASPARO:** Objection. **A** In my view, a terminal is a point where you make an electrical connection and an electrical connection can be made at the end. If a coil was broken or if a coil is whole, you can tapthecoil (sic). **Q.** Is that what you believe they're showing here? **A.** I can't tell from the drawing. **Q.** Just not enough information provided here? **MR GASPARO:** Objection. **A.** I can't see the bottom. November 22, 2005 Deposition of Barry Mosteller ("Mosteller Depo."), 51:18-52:25.

		This reference does not teach how to incorporate an electronic element in the manufacture of a plastic card **Q.** Right. But this document, 1103 [OS6B], does not show expressly how to embed a chip? **A.** No. November 22, 2005 Deposition of Barry Mosteller ("Mosteller Depo."), 67:3-6.
(a) providing first and second plastic core sheets;	1987 Oakwood Series 6 Brochure	"first and second plastic core sheets" – second opaque plastic layer and substrate beneath inductive codings (Sharinn Ex.10, OS6B at 4, see illustration).
(b) positioning said at least one electronic element in the absence of a non-electronic carrier sheet	1987 Oakwood Series 6 Brochure	"positioning …" – inductive codings are illustrated as being positioned between second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration).

between said first and second plastic core sheets to form a core, said plastic core sheets defining a pair of inner and outer surfaces of said core;	1987 Oakwood Series 6 Brochure	"in the absence of a nonelectronic carrier" – inductive codings are illustrated with no protection (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference does not teach positioning an electronic element "in the absence of a non-electronic carrier"* • There is no evidence that the illustration cited in this reference does not include a cavity or protective layer for protecting the inductive codings from heat and pressure during the lamination process. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.
	1987 Oakwood Series 6 Brochure	"directly" – inductive codings are in immediate physical contact with second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference also does not teach positioning an electronic element "directly between said first and second plastic core sheets"* • Again, there is no evidence to show that the illustration cited in this reference positions the inductive codings directly between plastic core sheets. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.

	1987 Oakwood Series 6 Brochure	"core" – second opaque plastic layer, inductive codings and substrate form the "core" (Sharinn Ex. 10, OS6B at 4, see illustration).
	1987 Oakwood Series 6 Brochure	"a pair of inner and outer surfaces of said core" – outside surface of second opaque plastic layer and outside surface of substrate are illustrated (Sharinn Ex. 10,OS6B at 4, see illustration).
(c) positioning said core in a laminator apparatus, and subjecting said core to a heat and pressure cycle, said heat and pressure cycle comprising the steps of:	1987 Oakwood Series 6 Brochure	"positioning said core in a laminator apparatus" – second opaque plastic layer, inductive codings and substrate can be positioned in the Series 6 laminator: "Many of the more sophisticated cards are made possible due only to the flexibility of the heat and pressure system which is a major feature of the Series 6 Laminators." (Sharinn Ex. 10, OS6B at 3, 4 see illustration).
	1987 Oakwood Series 6 Brochure	"heat and pressure cycle" –"[h]eat and pressure are applied" to second opaque plastic layer, inductive codings and substrate (Sharinn Ex. 10, OS6B at 3).
(i) heating said core for a first period of time;	1987 Oakwood Sales Brochure	"heating said core for a first period of time" – "P.V.C. Temp." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference teaches applying a pressure phase first.*



P.V.C. P.C.B. Cycle Curves

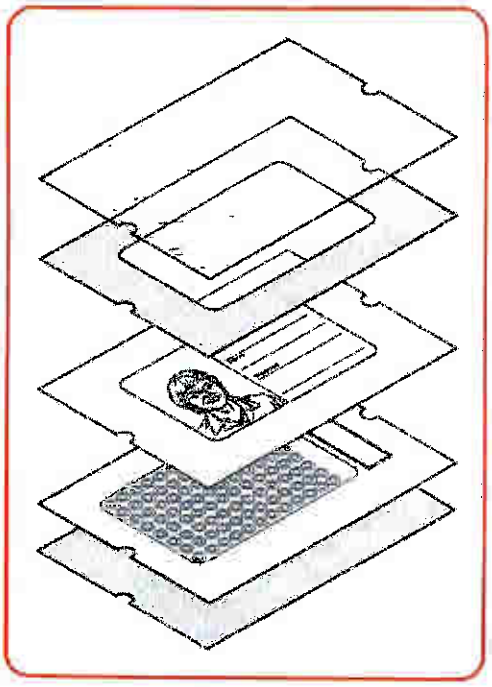
Q. So, when you say, "Sequence of events", do you mean that at first the low pressure would occur, and then the lamination temperature being increased and held to the fusion point would occur, then there would be the hold point? Is that what you mean?
A. That is correct.

November 16, 2005 Deposition of Richard Smith ("Smith Depo."), 59:22-60:2.

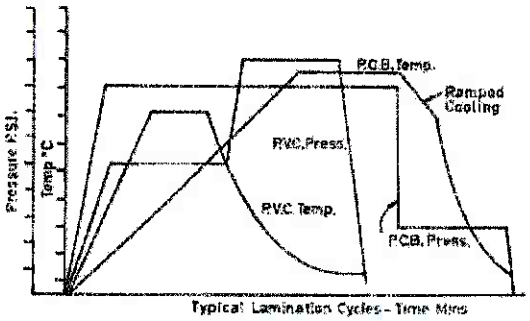
A. We have defined, in our earlier conversation, that we are using a low pressure and a high pressure. Therefore, point T1 is where it reaches its initial low pressure, and then waits for the temperature in the product to rise to its fusion temperature.

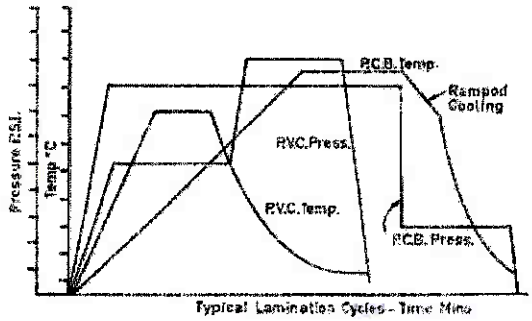
Smith Depo., 61:20-24.

(ii) applying a first pressure to said cure for a second period of time such that said at least one electronic element is encapsulated by said core;	1987 Oakwood Sales Brochure	"applying a first pressure … for a second period of time" – "P.V.C. Press." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6 see diagram). *This reference teaches applying a pressure phase first, then applying a heating phase* **Q.** So, when you say, "Sequence of events", do you mean that at first the low pressure would occur, and then the lamination temperature being increased and held to the fusion point would occur, then there would be the hold point? Is that what you mean? **A.** That is correct. Smith Depo., 59:22-60:2. *This reference also teaches encapsulating an electronic element during the heating phase, not during the pressure phase.* **A.** We have defined, in our earlier conversation, that we are using a low pressure and a high pressure. Therefore, point T1 is where it reaches its initial low pressure, and then waits for the temperature in the product to rise to its fusion temperature. Smith Depo., 61:20-24. **Q.** Could you put a, "T2", right where the hold phase begins with regard to the temperature? What was the purpose of commencing the hold phase once you had achieved the point that was designated by T2 there? **A.** In starting the heating process, we are measuring the temperature of the aluminum platten, not the plastic material itself. Therefore, T2 represents the point where the aluminum is to temperature. It then required a further period of time for that temperature to seep through to the centre of the plastic material. Many of the machines had multiple layers of cards within each platten opening, not a single card.

	1987 Oakwood Series 6 Brochure	"electronic element is encapsulated by said core" – during lamination inductive codings are enclosed by second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration). *The illustration cited in this reference fails to disclose anything about encapsulation of the electronic element*  *Card set for machine reading application.*
(iii) cooling said core while applying a second pressure to said core;	1987 Oakwood Sales Brochure	"cooling … while applying a second pressure" – "P.V.C. Temp." and "P.V.C. Press. "curves of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram).
(d) coating at least one of said outer surfaces of said core with a layer of ink; and	1991 Oakwood Instruction Manual	"coating … with a layer of ink"– "Combine some of these components with customized printed core and overlay materials …." (Sharinn Ex. 12, OIM at 1 ¶ 1)

(e) applying a layer of over laminate film to at least one of said outer surfaces of said core.	1987 Oakwood Series 6 Brochure	"overlaminate film" – bottom plastic opaque layer (Sharinn Ex. 10, OS6B at 4, see illustration).
	1991 Oakwood Instruction Manual	Sharinn Ex. 12, OIM at 1 ¶ 1 ("Combine some of these components with customized printed core and overlay materials…").
2. The process incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, where in said laminator apparatus has first and second laminating plates, at least one of said first and second laminating plates having a matte finish for creating a textured surface on at least one of said outer surfaces of said core	1987 Oakwood Series 6 Brochure	"first and second laminating plates" – "The card sets to be laminated are inserted between stainless steel laminating plates and inserted into the machine on the laminating tray."(Sharinn Ex. 10, OS6B at 3). *This reference does not disclose the finish of laminating plates nor does it disclose the texture of the surface of resulting laminated card.* "The card sets to be laminated are inserted between stainless steel laminating plates and inserted into the machine on the laminating tray." OS6B at 3.
4. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, where in said first and second plastic core sheets are made from a material selected from the group consisting of polyvinyl chloride, polyester, and acrylonitrile-butadiene styrene, each of said sheets having a thickness in the range of 0.007 to 0.024 inch.	1987 Oakwood Series 6 Brochure	"polyvinyl chloride" – second opaque plastic layer and substrate beneath inductive codings are made of plastic (P.V.C.) (Sharinn Ex. 10, OS6B at 3, 4, see illustration). *This reference fails to teach a process where the plastic core sheets are made of a material selected from the group consisting of polyvinyl chloride, polyester, and acrylonitrile-butadiene.* *This reference fails to disclose a thickness range of plastic sheets to be used*
6. The process for incorporating at least one	1987 Oakwood Sales Brochure	"said second pressure is greater than said first pressure" – "P.V.C. Press." curve of the

electronic element in the manufacture of a plastic card as recited in claim 1, wherein said second pressure is greater than said first pressure.		"Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram).
7. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 6, wherein said second pressure is at least approximately 25% greater than said first pressure.	1987 Oakwood Sales Brochure	"said second pressure is at least approximately 25% greater than said first pressure" – "P.V.C. Press." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference fails to indicate whether the second pressure is at least 25% greater than said first pressure.*  P.V.C. P.C.B. Cycle Curves **Q.** Was this chart intended to have any particular units associated with the pressure? If you can see there are tick marks that go up the left-hand vertical line there. **A.** No. This is just an indicative sales brochure. It has no relevance in terms of pressure or temperature. Smith Depo., 79:12-18.
8. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1,	1991 Oakwood Instruction Manual	"temperature in the range of 275.degree. F. to 400.degree. F." – unpatentable modification of prior art temperatures ("LAMINATING TEMPERATURE 90 – 200 DEGREES C" (Sharinn Ex. 12, OIM at 6, 3.3B)).

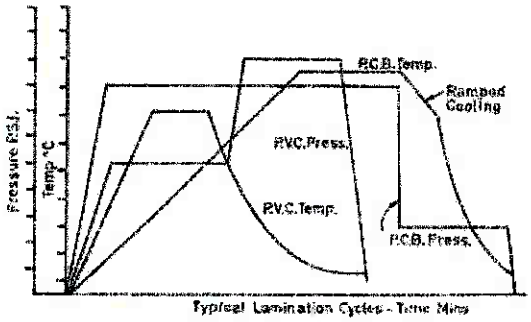
wherein said core is heated in step (c)(i) *to a temperature in the range of 275.degree. F. to 400.degree. F. and said first period of time is at least five (5) minutes*	1987 Oakwood Sales Brochure	"said first period of time is at least five (5) minutes" – "P.V.C. Temp." curve of the "Typical Lamination Cycles" diagram and horizontal axis of diagram indicating time in minutes ("Mins") (Sharinn Ex. 11, OSB at 6, see diagram). *This reference fails to identify the length of time at which the temperature is held*  P.V.C. P.C.B. Cycle Curves **Q.** Thank you. The same thing with regard to temperature, it is just meant to designate that the temperature is increasing, but there is no designator that we could associate with any of these tick marks here, right? **A.** That's correct. Smith Depo., 79:19-24.
11. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said step (c) is carried out utilizing a coating technique selected from the group consisting of silk screen printing, offset printing, letterpress printing, screen printing, roller coating, spray	1991 Oakwood Instruction Manual	"coating technique selected from the group consisting of …" – "Combine some of these components with customized printed core and overlay materials …." (Sharinn Ex. 12, OIM at 1, ¶ 1). *This reference fails to disclose a process where the core is coated using a coating technique selected from the group consisting of silk screen printing, offset printing, letterpress printing, screen printing, roller coating, spray printing, and*

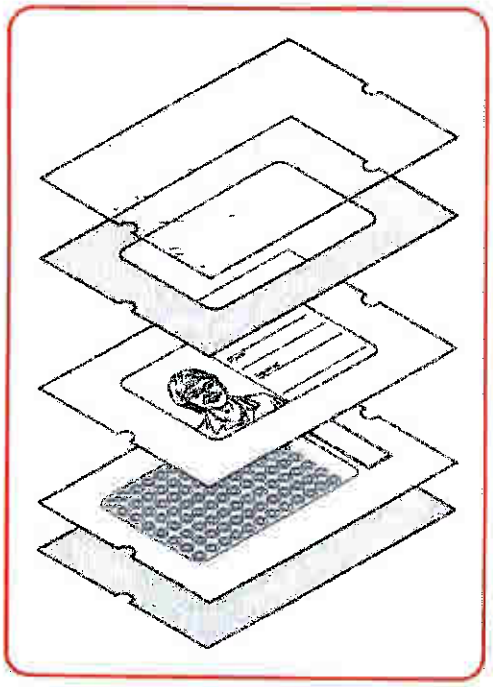
printing, and litho printing.		*litho-printing.*
13. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said at least one electronic element is a micro-chip and an associated wire antenna.	1987 Oakwood Series 6 Brochure	"micro-chip and an associated wire antenna" – Sharinn Ex. 10, OS6B at 4, see text under heading "Machine Reading Applications". *This reference fails to disclose a process as recited in claim 1, "wherein electronic element is a micro-chip and an associated wire antenna."*
14. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said at least one electronic element is a micro-chip and an associated circuit board antenna.	1987 Oakwood Series 6 Brochure	"micro-chip and an associated circuit board antenna" – Sharinn Ex. 10, OS6B at 4, see text under heading "Machine Reading Applications". *This reference fails to disclose a process as recited in claim 1, "wherein electronic element is a micro-chip and an associated circuit board antenna."*
15. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said at least one electronic element is a read/write integrated chip and an associated antenna.	1987 Oakwood Series 6 Brochure	"read/write integrated chip and an associated antenna" – Sharinn Ex. 10, OS6B at 4, see text under heading "Machine Reading Applications". *This reference fails to disclose a process as recited in claim 1, "wherein electronic element is a read/write chip and an associated antenna."*
16. A hot lamination process for the manufacture of plastic cards, said process comprising the steps of:	1987 Oakwood Sales Brochure	"A hot lamination process for the manufacture of plastic cards" – "Oakwood has developed a unique lamination cycle for the highest quality bank and credit card manufacturing producing a well laminated structure …. The temperature of all platens is controlled individually to provide uniform heating throughout the press." (Sharinn Ex. 11, OSB at 6).
(a) providing first and second plastic core sheets;	1987 Oakwood Series 6 Brochure	"first and second plastic core sheets" –- second opaque plastic layer and substrate beneath inductive codings (Sharinn Ex. 10,

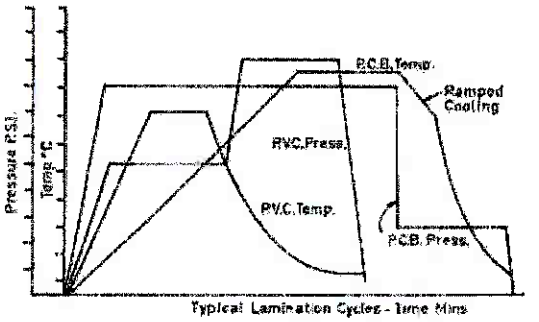
		OS6B at 4, see illustration).
(b) positioning at least one electronic element in the absence of a non-electronic carrier directly between said first and second plastic core sheets to form a layered core;	1987 Oakwood Series 6 Brochure	"positioning …" – inductive coils are illustrated as being positioned between second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration).
	1987 Oakwood Series 6 Brochure	"electronic element" – inductive codings or microchip (Sharinn Ex. 10, OS6B at 4, see illustration and text under heading "Machine Reading Applications"). *This reference does not disclose an electronic element* • See the '207 patent, claim 1, preamble for explanation.
	1987 Oakwood Series 6 Brochure	"in the absence of a non-electronic carrier" – inductive codings are illustrated with no protection (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference does not teach positioning an electronic element "in the absence of a non-electronic carrier"* • There is no evidence that the illustration cited in this reference does not include a cavity or protective layer for protecting the inductive codings from heat and pressure during the lamination process. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.

	1987 Oakwood Series 6 Brochure	"directly" – inductive coils are in immediate physical contact with second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference also does not teach positioning an electronic element "directly between said first and second plastic core sheets"* • Again, there is no evidence to show that the illustration cited in this reference positions the inductive codings directly between plastic core sheets. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.
	1987 Oakwood Series 6 Brochure	"layered core" – second opaque plastic layer, inductive codings and substrate form the "core" (Sharinn Ex. 10, OS6B at 4, see illustration).
(c) positioning said core in a laminator apparatus, and subjecting said core to a heat and pressure cycle, said heat and pressure cycle comprising the steps of:	1987 Oakwood Series 6 Brochure	"positioning said core in a laminator apparatus" – second opaque plastic layer, inductive codings and substrate can be positioned in the Series 6 laminator: "Many of the more sophisticated cards are made possible due only to the flexibility of the heat and pressure system which is a major feature of the Series 6 Laminators." (Sharinn Ex. 10, OS6B at 3, 4 see illustration).
	1987 Oakwood Series 6 Brochure	"heat and pressure cycle" – "heat and pressure are applied" to second opaque plastic layer, inductive codings and substrate (Sharinn Ex. 10, OS6B at 3).

(i) heating said core in said laminator, in the presence of a minimal first ram pressure, to a temperature which causes controlled flow of said plastic which makes up said first and second plastic core sheets;	1987 Oakwood Sales Brochure	"heating said core" – "P.V.C. Temp." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram).
	1987 Oakwood Sales Brochure	"minimal first ram pressure" – Sharinn Ex. 11, OSB at 6, see initial "P.V.C. Press." Ramp up in illustration.
	1991 Oakwood Instruction Manual	Sharinn Ex. 12, OIM at 6 ("Low pressure is applied to the material during the heating stage to achieve lamination.").
	1991 Oakwood Instruction Manual	"controlled flow of said plastic" – "Actual lamination will take place when the material has reached a molten stage at very low pressures." (Sharinn Ex. 12, OIM at 6).

(ii) applying a second pressure uniformly across said core for encapsulating said at least one electronic element within said controlled flow plastic;	1987 Oakwood Sales Brochure	"applying a second pressure" – "P.V.C. Press." Curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference does not teach applying a second pressure at the lamination temperature for encapsulating the electronic element*  P.V.C. P.C.B. Cycle Curves *The second pressure taught by this reference is applied after encapsulation of the electronic element* **Q.** For the record, what is the purpose of the high pressure that begins at the Vicat point? **A.** As we had mentioned earlier, when the materials are held at the low pressure, if it was continued through at the low pressure to the end of the machine cycle, the result would be a poor surface finish and we used the term, "Puddling", before. Increasing to the high pressure, we create the surface finish that we see on plastic cards today in your pocket. Smith Depo., 67:6-15.

	1987 Oakwood Sales Brochure	"uniformly across said core" – "Precise, uniform pressure distribution over the whole platan eliminating pressure losses at the edges and corners." (Sharinn Ex. 11, OSB at 1).
	1987 Oakwood Series 6 Brochure	"encapsulating said at least one electronic element" – during lamination inductive codings are enclosed by second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration). *The illustration cited in this reference does not teach the process of encapsulating the electronic element*  *Card set for machine reading application.*

(iii) subsequently cooling said core in conjunction with the concurrent application of a third pressure uniformly across said core, said core including and upper and lower surfaces;	1987 Oakwood Sales Brochure	"cooling . . . in conjunction with the concurrent application of a third pressure" – "P.V.C. Temp." and "P.V.C. Press." curves of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference does not disclose the application of a third pressure*  P.V.C. P.C.B. Cycle Curves
	1987 Oakwood Sales Brochure	"uniformly across said core" – "Precise, uniform pressure distribution over the whole platen eliminating pressure losses at the edges and corners." (Sharinn Ex. 11, OSB at 1).
(d) printing on at least one of said upper and lower surfaces of said core such that a layer of ink is applied to at least a portion of said at least one upper and lower surface of said core.	1991 Oakwood Instruction Manual	"printing on at least one of said upper and lower surfaces of said core" – "Combine some of these components with customized printed core and overlay materials …" (Sharinn Ex. 12, OIM at 1 ¶ 1).
17. The method as recited in claim 16 wherein said first and second core layers are devoid of any appreciable cutouts.	1987 Oakwood Series 6 Brochure	"first and second core layers are devoid of any appreciable cutouts" – second opaque plastic layer and substrate beneath the inductive codings (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference does not teach a configuration where core layers are devoid of cutouts* **A.** In the top part of the drawing, there's a photograph that is shown on the second

		opaque plastic layer. The first opaque plastic layer has a cutout picture frame around it that would fit over that picture so that it would present an even and flat surface or lamination. That box that's around where the coils are is not there as an aesthetic. It's drawn for a reason. The reason I feel it's not there for aesthetics is because it's sandwiched between opaque layers, and putting aesthetics on what layer would be fruitile (sic). So my opinion is that it designates a cutout, just like it does in the first opaque layer, and that in that cutout is the substrate with the coils. November 22, 2005 Deposition of Barry Mosteller ("Mosteller Depo."), 59:22-60:12.

Invalidity Claim Chart
in Support of
Oberthur's Summary Judgment Motion for Invalidity

U.S. Pat. No. 6,036,099

Reference Key:
- 1987 Oakwood Series 6 Brochure ("OS6B")
- 1987 Oakwood Sales Brochure ("OSB")
- 1991 Oakwood Series 6 Instruction Manual ("OIM")

Claims (missing claim elements are highlighted in green)	**Prior Art**	**Application of Prior Art** (missing claim elements are highlighted in green)
1. A process for incorporating at least one electronic element in the manufacture of a plastic card, comprising the steps of:	1987 Oakwood Series 6 Brochure	"electronic element" – inductive codings or microchip (Sharinn Ex. 10, OS6B at 4, see illustration and text under heading "Machine Reading Applications"). *This reference does not disclose an electronic element.* See the '207 patent, claim 1, preamble for explanation. *This reference does not teach how to incorporate an electronic element in the manufacture of a plastic card.* See '207 patent, claim 1.
(a) providing first and second plastic core sheets;	1987 Oakwood Series 6 Brochure	"first and second plastic core sheets" - second opaque plastic layer and substrate beneath inductive codings (Sharinn Ex. 10, OS6B at 4, see illustration).
(b) positioning said at least one electronic element in the absence of a non-electronic carrier directly between said first and second plastic core sheets to form a core, said	1987 Oakwood Series 6 Brochure	"positioning …" – inductive codings are illustrated as being positioned between second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration).

plastic core sheets defining a pair of inner and outer surfaces of said core;	1987 Oakwood Series 6 Brochure	"in the absence of a non-electronic carrier" – inductive codings are illustrated with no protection (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference does not teach positioning an electronic element "in the absence of a non-electronic carrier"* • There is no evidence that the illustration cited in this reference does not include a cavity or protective layer for protecting the inductive codings from heat and pressure during the lamination process. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.

	1987 Oakwood Series 6 Brochure	"directly" – inductive codings are in immediate physical contact with second opaque plastic layer and substrate (Sharinn Ex. 10, OS6B at 4, see illustration). *This reference also does not teach positioning an electronic element "directly between said first and second plastic core sheets"* • Again, there is no evidence to show that the illustration cited in this reference positions the inductive codings directly between plastic core sheets. • The conclusory statements provided by Oberthur are not sufficient to show that this illustration discloses this claim element. • The picture alone is insufficient to enable a person having ordinary skill in the art to laminate a card in such a way.
	1987 Oakwood Series 6 Brochure	"core" – second opaque plastic layer, inductive codings and substrate form the "core" (Sharinn Ex. 10, OS6B at 4, see illustration).
	1987 Oakwood Series 6 Brochure	"a pair of inner and outer surfaces of said core" – outside surface of second opaque plastic layer and outside surface of substrate are illustrated (Sharinn Ex. 10, OS6B at 4, see illustration).

(c) positioning said core in a laminator apparatus, and subjecting said core to a heat and pressure cycle; said heat and pressure cycle comprising the steps of:	1987 Oakwood Series 6 Brochure	"positioning said core in a laminator apparatus" – second opaque plastic layer, inductive codings and substrate can be positioned in the Series 6 laminator: "Many of the more sophisticated cards are made possible due only to the flexibility of the heat and pressure system which is a major feature of the Series 6 Laminators." (Sharinn Ex. 10, OS6B at 3, 4 see illustration).
	1987 Oakwood Series 6 Brochure	"heat and pressure cycle" – "[h]eat and pressure are applied" to second opaque plastic layer, inductive codings and substrate (Sharinn Ex. 10, OS6B at 3).
(i) heating said core for a first period of time;	1987 Oakwood Sales Brochure	"heating said core for a first period of time" – "P.V.C. Temp." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference teaches applying a pressure phase first* *See '207 patent, claim 1, element (c)(i)*
(ii) applying a first pressure to said core for a second period of time such that said at least one electronic element is encapsulated by said core;	1987 Oakwood Sales Brochure	"applying a first pressure … for a second period of time" – "P.V.C. Press." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram). *This reference teaches applying a pressure phase first, then applying a heating phase* • See '207 patent, claim 1, element (c)(ii). *This reference also teaches encapsulating an electronic element during the heating phase, not during the pressure phase* • See '207 patent, claim 1, element

		(c)(ii).
(iii) cooling said core while applying a second pressure to said core;	1987 Oakwood Sales Brochure	"cooling … while applying a second pressure" – "P.V.C. Temp." and "P.V.C. Press." curves of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram).
(d) coating at least one of said outer surfaces of said core with a layer of ink;	1991 Oakwood Instruction Manual	"coating … with a layer of ink" – "Combine some of these components with customized printed core and overlay materials …" (Sharinn Ex. 12, OIM at 1 ¶1).
4. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said first and second plastic core sheets are made from a material selected from the group consisting of polyvinyl chloride, polyester, and acrylonitrile-butadiene styrene, each of said sheets having a thickness in the range of 0.007 to 0.024 inch.	1987 Oakwood Series 6 Brochure	"polyvinyl chloride" – second opaque plastic layer and substrate beneath inductive codings are made of plastic (P.V.C.) (Sharinn Ex. 10, OS6B at 3, 4, see illustration"). *This reference fails to teach a process where the plastic core sheets are made of a material selected from the group consisting of polyvinyl chloride, polyester, and acrylonitrile-butadiene* *This reference fails to disclose a thickness range of plastic sheets to be used* • See '207 patent, claim 4.
6. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said second pressure is greater than said first pressure.	1987 Oakwood Sales Brochure	"said second pressure is greater than said first pressure" – "P.V.C. Press." curve of the "Typical Lamination Cycles" diagram (Sharinn Ex. 11, OSB at 6, see diagram).
8. A hot lamination process as recited in claim 1 having a further step following step (d), said step comprising: positioning said core in a	1987 Oakwood Series 6 Brochure	"overlaminate film" – second opaque plastic layer, inductive codings, substrate and bottom plastic opaque layer can be positioned in the Series 6 laminator (Sharinn Ex. 10, OS6B at 3, 4, see illustration).

laminator apparatus with a layer of overlaminate film on at least one of said upper and lower surfaces of said core and laminating said layer of overlaminate film to said core in said laminator to thereby form a sheet of plastic card stock.	1991 Oakwood Instruction Manual	Sharinn Ex. 12, OIM at 1 ¶ 1 ("Combine some of these components with customized printed core and overlay materials…").
9. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said core is heated in step (c)(i) to a temperature in the range of 275.degree. F. to 400.degree. F. and said first period of time is at least five (5) minutes	1991 Oakwood Instruction Manual	"temperature in the range of 275.degree. F. to 400.degree. F." – unpatentable modification of prior art temperatures ("LAMINATING TEMPERATURE 90 – 200 DEGREES C" (Sharinn Ex. 12, OIM at 6, ¶ 3.3B).
	1987 Oakwood Sales Brochure	"said first period of time is at least five (5) minutes" - "P.V.C. Temp." curve of the "Typical Lamination Cycles" diagram and horizontal axis of diagram indicating time in minutes ("Mins") (Sharinn Ex. 11, OSB at 6, see diagram). *This reference fails to identify the length of time at which the temperature is held.* • See '207 patent, claim 8.
12. The process for incorporating at least one electronic element in the manufacture of a plastic card as recited in claim 1, wherein said step (d) is carried out utilizing a coating technique selected from the group consisting of silk screen printing, offset printing	1991 Oakwood Instruction Manual	"coating technique selected from the group consisting of …" – "Combine some of these components with customized printed core and overlay materials …." (Sharinn Ex. 12, OIM at 1, ¶ 1). *This reference fails to disclose a process where the core is coated using a coating technique selected from the group consisting of silk screen printing, offset printing, letterpress printing, screen*